

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	)	) Chapter 7
	)	)
FORMER BL STORES, INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 24-11985 (KBO)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	Hearing Date: January 29, 2026, at 11:00 a.m. (ET)
	)	Objection Deadline: January 16, 2026, at 4:00 p.m. (ET)

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**SUMMARY COVER SHEET TO COMBINED SIXTH MONTHLY,  
FOURTH INTERIM AND FINAL FEE APPLICATION OF PWC US TAX LLP  
AS TAX COMPLIANCE AND TAX ADVISORY SERVICES PROVIDER TO THE  
DEBTORS FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM SEPTEMBER 9, 2024 THROUGH NOVEMBER 10, 2025**

<u>Name of Applicant:</u>	PwC US Tax LLP
<u>Authorized to Provide Professional Services to:</u>	Debtors and Debtors in Possession
<u>Date of Retention:</u>	October 9, 2024, effective as of September 9, 2024
<u>Monthly/Interim Period for Which Compensation and Reimbursement Are Requested:</u>	July 1, 2025 through November 10, 2025
<u>Total Monthly/Interim Amount of Compensation Sought as Actual, Reasonable and Necessary:</u>	\$26,110.20
<u>Monthly/Interim Amount of Expense Reimbursement Requested:</u>	\$0.00

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<sup>1</sup> The debtors and debtors in possession in these chapter 7 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The former address of the debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Final Period for Which Compensation and Reimbursement Are Requested:

September 9, 2024 through November 10, 2025

Total Final Amount of Compensation Sought as Actual, Reasonable and Necessary:

\$1,151,202.60

Final Amount of Expense Reimbursement Requested:

\$0.00

This is a(n): monthly  interim  final application

**SUMMARY OF PREVIOUSLY FILED MONTHLY FEE APPLICATIONS:**

Application No. / Date / Docket No.	Application Period	Fees Requested (80%/100%)	Expenses Requested (100%)	CNO Filed	20% Holdback	Fees and Expenses Paid to Date	Total Outstanding Fees and Expenses
Combined First Monthly; Filed: 12/17/2024; Dkt. No. 1377	9/9/2024 – 10/31/2024	\$219,566.16 (80% of \$274,457.70)	\$0.00	Filed 1/8/2025; Dkt. No. 1637	\$54,891.54	\$274,457.70 <sup>2</sup>	\$0.00
Second Monthly; Filed: 12/27/2024; Dkt. No. 1446	11/1/2024 – 11/30/2024	\$244,372.00 (80% of \$305,465.00)	\$0.00	Filed 1/22/2025; Dkt. No. 1825	\$61,093.00	\$305,465.00 <sup>3</sup>	\$0.00
Third Monthly; Filed: 1/29/2025; Dkt. No. 1874	12/1/2024 – 12/31/2024	\$55,555.20 (80% of \$69,444.00)	\$0.00	Filed 3/17/2025; Dkt. No. 2257	\$13,888.80	\$69,444.00	\$0.00
Fourth Monthly; Filed: 5/15/2025; Dkt. No. 2747	1/1/2025 – 3/31/2025	\$322,498.56 (80% of \$403,123.20)	\$0.00	Filed 7/16/2025; Dkt. No. 2972	\$80,624.64	\$403,123.20	\$0.00
Fifth Monthly; Filed: 8/14/2025; Dkt. No. 3086	4/1/2025 – 6/30/2025	\$58,082.00 (80% of \$72,602.50)	\$0.00	Filed 9/5/2025; Dkt. No. 3142	\$14,520.50	\$72,602.50	\$0.00
<b>Totals:</b>	<b>9/9/2024 – 6/30/2025</b>	<b>\$900,073.92 (80% of \$1,125,092.40)</b>	<b>\$0.00</b>		<b>\$225,018.48</b>	<b>\$1,125,092.40</b>	<b>\$0.00</b>

<sup>2</sup> \$20,000 was a pre-payment paid by the Debtors prior to the Petition Date.<sup>3</sup> \$63,000 was a pre-payment paid by the Debtors prior to the Petition Date.

**SUMMARY OF PREVIOUSLY FILED INTERIM FEE APPLICATIONS:**

Application No. / Date / Docket No.	Application Period	Fees Requested (100%)	Expenses Requested (100%)	Interim Fee Order Entered	Fees and Expenses Paid to Date	Outstanding Fees and Expenses
First Interim; Filed: 1/29/2025; Dkt. No. 1875	9/9/2024 – 12/31/2024	\$649,366.70	\$0.00	Entered 3/18/2025; Dkt. No. 2271	\$649,366.70	\$0.00
Second Interim; Filed: 5/15/2025; Dkt. No. 2747	1/1/2025 – 3/31/2025	\$403,123.20	\$0.00	Entered 7/17/2025; Dkt. No. 2973	\$403,123.20	\$0.00
Third Interim; Filed: 8/14/2025; Dkt. No. 3086	4/1/2025 – 6/30/2025	\$72,602.50	\$0.00	Entered 9/9/2025; Dkt. No. 3150	\$72,602.50	\$0.00
<b>Totals:</b>	<b>9/9/2024 – 6/30/2025</b>	<b>\$1,125,092.40</b>	<b>\$0.00</b>		<b>\$1,125,092.40</b>	<b>\$0.00</b>

**SUMMARY OF FEES AND EXPENSES<sup>4</sup>****For the Fourth Interim Application Period from July 1, 2025 through November 10, 2025***Summary of Hours and Compensation by Billing Category and Project Category:*

Billing Category and Project Category	Hours	Total Compensation
<b>Fixed Fee Services</b>		
2024 Tax Compliance Services	1,090.00	\$0.00 <sup>1</sup>
<b>Subtotal - Hours and Compensation - Fixed Fee Services</b>	<b>1,090.00</b>	<b>\$0.00</b>
<b>Hourly Services</b>		
Tax Advisory Services	18.30	\$20,710.20
<b>Subtotal - Hours and Compensation - Hourly Services</b>	<b>18.30</b>	<b>\$20,710.20</b>
<b>Bankruptcy Compliance Services</b>		
Fee Applications	13.50	\$5,400.00
<b>Subtotal - Hours and Compensation - Bankruptcy Compliance Services</b>	<b>13.50</b>	<b>\$5,400.00</b>
<b>Total - Hours and Compensation - All Services</b>	<b>1,121.80</b>	<b>\$26,110.20</b>

<sup>1</sup> As set forth in the applicable Statement of Work, the \$220,000 fixed fee in connection with the 2024 Tax Compliance Services is due upon acceptance of the Statement of Work, subject to the terms of the Interim Compensation Procedures Order. The entirety of the \$220,000 was requested in PwC US Tax's combined fourth monthly and second interim fee application for the period from January 1 - March 31, 2025 (Docket No. 2747). PwC US Tax continued to provide 2024 Tax Compliance Services through the Conversion Date.

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<sup>4</sup> PwC US Tax does not request reimbursement of any expenses during the Fourth Interim Application Period or the Final Application Period.

***Summary of Hours and Compensation by Project Category and Professional  
(Fixed Fee Services):***

<b>Project Category and Professional</b>	<b>Position</b>	<b>Hours</b>	<b>Total Compensation</b>
<b>Fixed Fee Services</b>			
<b><i>2024 Tax Compliance Services</i></b>			
Craig Keller	Partner	8.00	
Lesa Shoemaker	Partner	7.00	
Brian Trueman	Director	72.00	
Anna Belluardo	Manager	122.50	
Austin Oberhausen	Manager	26.00	
Gitika Thirani	Senior Associate	28.00	
Natania Patterson	Senior Associate	191.50	
Stella Huang	Senior Associate	81.50	
Jacob DeVendra	Associate	20.50	
Madeline Studer	Associate	14.50	
Matthew Messer	Associate	3.00	
Yoel Herrera	Associate	113.50	
Christopher Trout	Specialist	162.50	
Emmanuel Bernadin	Specialist	48.00	
Ozzy Botero	Specialist	179.50	
Ryan Gustafson	Specialist	12.00	
<b>Subtotal - 2024 Tax Compliance Services</b>		<b>1,090.00</b>	<b>\$0.00</b> <sup>1</sup>
<b>Total - Hours and Compensation Sought - Fixed Fee Services</b>		<b>1,090.00</b>	<b>\$0.00</b>

<sup>1</sup> As set forth in the applicable Statement of Work, the \$220,000 fixed fee in connection with the 2024 Tax Compliance Services is due upon acceptance of the Statement of Work, subject to the terms of the Interim Compensation Procedures Order. The entirety of the \$220,000 was requested in PwC US Tax's combined fourth monthly and second interim fee application for the period from January 1 - March 31, 2025 (Docket No. 2747). PwC US Tax continued to provide 2024 Tax Compliance Services through the Conversion Date.

***Summary of Hours and Compensation by Project Category and Professional  
(Hourly Services):***

Project Category and Professional	Position	Rate	Hours	Total Compensation
<b>Hourly Services</b>				
<i>Tax Advisory Services</i>				
Sean Kelly	Partner	\$1,330	2.60	\$3,458.00
Elyse Acosta	Senior Manager	\$1,141	12.20	\$13,920.20
Will Gaziano	Senior Associate	\$952	3.50	\$3,332.00
<b>Subtotal - Tax Advisory Services</b>			<b>18.30</b>	<b>\$20,710.20</b>
<b>Subtotal - Hourly Services</b>			<b>18.30</b>	<b>\$20,710.20</b>
 <b>Bankruptcy Compliance Services</b>				
<i>Fee Applications</i>				
Chris Lewis	Senior Manager	\$400	13.50	\$5,400.00
<b>Subtotal - Fee Applications</b>			<b>13.50</b>	<b>\$5,400.00</b>
<b>Subtotal - Bankruptcy Compliance Services</b>			<b>13.50</b>	<b>\$5,400.00</b>
 <b>Total - Hours and Compensation Sought - Hourly Services</b>			<b>31.80</b>	<b>\$26,110.20</b>

**For the Final Application Period from September 9, 2024 through November 10, 2025*****Summary of Hours and Compensation by Billing Category and Project Category:***

Billing Category and Project Category	Hours	Total Compensation
<b>Fixed Fee Services</b>		
2023 Tax Compliance Services	1,020.20	\$98,000.00 <sup>1</sup>
2024 Tax Compliance Services	1,337.00	\$220,000.00 <sup>2</sup>
<b>Subtotal - Hours and Compensation - Fixed Fee Services</b>	<b>2,357.20</b>	<b>\$318,000.00</b>
<b>Hourly Services</b>		
Tax Advisory Services	769.00	\$813,487.60
<b>Subtotal - Hours and Compensation - Hourly Services</b>	<b>769.00</b>	<b>\$813,487.60</b>
<b>Bankruptcy Compliance Services</b>		
Retention Applications	27.80	\$13,535.00
Fee Applications	48.70	\$19,480.00
<b>Subtotal - Hours and Compensation - Bankruptcy Compliance Services</b>	<b>76.50</b>	<b>\$33,015.00</b>
<b>Less Prior Fee Reduction</b>		<b>-\$13,300.00 <sup>3</sup></b>
<b>Total - Hours and Compensation - All Services</b>	<b>3,202.70</b>	<b>\$1,151,202.60</b>

<sup>1</sup> As set forth in the PwC US Tax Retention Application, the 2023 tax compliance engagement is a fixed fee arrangement whereby PwC US Tax has agreed to be paid a total \$150,000, exclusive of expenses. Prior to the Petition Date, PwC US Tax was paid \$135,000 for tax compliance services, of which \$83,000 remained as of the Petition Date to be applied against approved post-petition fees for such post-petition tax compliance services.

<sup>2</sup> As set forth in the applicable Statement of Work, the \$220,000 fixed fee in connection with the 2024 Tax Compliance Services is due upon acceptance of the Statement of Work, subject to the terms of the Interim Compensation Procedures Order. The entirety of the \$220,000 was requested in PwC US Tax's combined fourth monthly and second interim fee application for the period from January 1 - March 31, 2025 (Docket No. 2747). PwC US Tax continued to provide 2024 Tax Compliance Services through the Conversion Date.

<sup>3</sup> Pursuant to a prior agreement with the Office of the United States Trustee, PwC US Tax agreed to reduce its first fee application request by \$13,300. See PwC US Tax's first monthly fee application for the period from September 9, 2024 through October 31, 2024 [Docket No. 1337].

***Summary of Hours and Compensation by Project Category and Professional  
(Fixed Fee Services):***

Project Category and Professional	Position	Hours	Total Compensation
<b>Fixed Fee Services</b>			
<b>2023 Tax Compliance Services</b>			
Craig Keller	Partner	5.00	
Lesa Shoemaker	Partner	7.50	
Brian Trueman	Director	93.00	
Nicole Berkow	Senior Manager	30.50	
Anna Belluardo	Manager	218.00	
Austin Oberhausen	Manager	1.00	
Nicholl Troncoso	Manager	1.00	
Matt Koebberman	Senior Associate	74.00	
Natania Patterson	Senior Associate	7.00	
Rhys Jonard	Senior Associate	19.50	
Stella Huang	Senior Associate	205.70	
Hope Randolph	Associate	3.00	
Madeline Studer	Associate	12.00	
Matthew Messer	Associate	7.00	
Tommy McAvoy	Associate	193.50	
Alexander Loeb	Specialist	17.50	
Bryanna Fountain	Specialist	10.00	
Emily Nguyen	Specialist	101.00	
Mouad Kharbach	Specialist	14.00	
<b><i>Subtotal - Tax Compliance Services</i></b>		<b><i>1,020.20</i></b>	<b><i>\$98,000.00</i></b> <sup>1</sup>
<b>2024 Tax Compliance Services</b>			
Craig Keller	Partner	15.50	
David Ernick	Principal	1.50	
Lesa Shoemaker	Partner	8.00	
Lowell Huth	Partner	0.50	
Brian Trueman	Director	106.00	
Tom Carpenter	Director	3.00	
Matthew Harris	Senior Manager	1.50	
Nicole Berkow	Senior Manager	24.50	
Anna Belluardo	Manager	142.00	
Austin Oberhausen	Manager	51.50	
Nicholl Troncoso	Manager	0.50	
Gitika Thirani	Senior Associate	28.50	
Natania Patterson	Senior Associate	192.00	
Ryan Cavanaugh	Senior Associate	1.50	
Ryan Miller	Senior Associate	4.00	
Stella Huang	Senior Associate	114.00	
Jacob DeVendra	Associate	20.50	
Kaylee McMullen	Associate	5.00	
Mackenzie Summers	Associate	8.00	
Madeline Studer	Associate	14.50	
Matthew Messer	Associate	55.50	

***Summary of Hours and Compensation by Project Category and Professional  
(Fixed Fee Services) (continued):***

Project Category and Professional	Position	Hours	Total Compensation
Mia Gerthoffer	Associate	7.00	
Tommy McAvoy	Associate	6.00	
Yoel Herrera	Associate	113.50	
Christopher Trout	Specialist	163.00	
Emily Nguyen	Specialist	0.50	
Emmanuel Bernadin	Specialist	48.00	
Ozzy Botero	Specialist	179.50	
Ryan Gustafson	Specialist	21.50	
<b><i>Subtotal - 2024 Tax Compliance Services</i></b>		<b><i>1,337.00</i></b>	<b><i>\$220,000.00</i></b> <sup>2</sup>
<b>Total - Hours and Compensation Sought - Fixed Fee Services</b>		<b>2,357.20</b>	<b>\$318,000.00</b>

- 1 As set forth in the PwC US Tax Retention Application, the 2023 tax compliance engagement is a fixed fee arrangement whereby PwC US Tax has agreed to be paid a total \$150,000, exclusive of expenses. Prior to the Petition Date, PwC US Tax was paid \$135,000 for tax compliance services, of which \$83,000 remained as of the Petition Date to be applied against approved post-petition fees for such post-petition tax compliance services.
- 2 As set forth in the applicable Statement of Work, the \$220,000 fixed fee in connection with the 2024 Tax Compliance Services is due upon acceptance of the Statement of Work, subject to the terms of the Interim Compensation Procedures Order. The entirety of the \$220,000 was requested in PwC US Tax's combined fourth monthly and second interim fee application for the period from January 1 - March 31, 2025 (Docket No. 2747). PwC US Tax continued to provide 2024 Tax Compliance Services through the Conversion Date.

***Summary of Hours and Compensation by Project Category and Professional  
(Hourly Services):***

Project Category and Professional	Position	Rate	Hours	Total Compensation
<b>Hourly Services</b>				
<i>Tax Advisory Services</i>				
Art Sewall	Partner	\$1,330	1.00	\$1,330.00
Bob Ritter	Partner	\$1,265	11.40	\$14,421.00
Craig Keller	Partner	\$1,265	30.40	\$38,456.00
George Manousos	Partner	\$1,265	2.50	\$3,162.50
Hardeo Bissoondial	Partner	\$1,265	2.80	\$3,542.00
Lesa Shoemaker	Partner	\$1,265	68.30	\$86,399.50
Lindsay Galvin	Partner	\$1,265	1.50	\$1,897.50
Michelle Hanzely	Principal	\$1,265	3.30	\$4,174.50
Sean Kelly	Partner	\$1,330	55.00	\$73,150.00
Andrea McIntire	Director	\$1,006	2.50	\$2,515.00
Brian Trueman	Director	\$1,006	84.90	\$85,409.40
Hudson Harrison	Director	\$1,006	2.50	\$2,515.00
Tom Carpenter	Director	\$1,006	10.70	\$10,764.20
Tom Fagan	Director	\$1,006	2.60	\$2,615.60
Zak Adkins	Director	\$1,006	13.40	\$13,480.40
Elyse Acosta	Senior Manager	\$1,141	223.40	\$254,899.40
Evan Amundson	Senior Manager	\$918	2.00	\$1,836.00
Nicole Berkow	Senior Manager	\$918	7.80	\$7,160.40
Anna Belluardo	Manager	\$829	1.00	\$829.00
Austin Oberhausen	Manager	\$829	4.80	\$3,979.20
Joseph Beiter	Manager	\$829	5.50	\$4,559.50
Steven Shao	Manager	\$829	7.50	\$6,217.50
Maddi Cooperrider	Senior Associate	\$952	1.10	\$1,047.20
Rhys Jonard	Senior Associate	\$702	46.20	\$32,432.40
Ryan Miller	Senior Associate	\$702	3.20	\$2,246.40
Stella Huang	Senior Associate	\$702	1.00	\$702.00
Will Gaziano	Senior Associate	\$952	128.00	\$121,856.00
Evan Hannan	Experienced Associate	\$743	38.30	\$28,456.90
Mia Gerthoffer	Experienced Associate	\$554	4.90	\$2,714.60
Matthew Messer	Associate	\$479	0.50	\$239.50
Tommy McAvoy	Associate	\$479	1.00	\$479.00
<b>Subtotal - Tax Advisory Services</b>		<b>769.00</b>		<b>\$813,487.60</b>
<b>Subtotal - Hourly Services</b>		<b>769.00</b>		<b>\$813,487.60</b>
<b>Bankruptcy Compliance Services</b>				
<i>Retention Applications</i>				
Thalia Cody	Director	\$550	16.10	\$8,855.00
Chris Lewis	Manager	\$400	11.70	\$4,680.00
<b>Subtotal - Retention Applications</b>		<b>27.80</b>		<b>\$13,535.00</b>
<i>Fee Applications</i>				
Chris Lewis	Senior Manager	\$400	48.70	\$19,480.00
<b>Subtotal - Fee Applications</b>		<b>48.70</b>		<b>\$19,480.00</b>
<b>Subtotal - Bankruptcy Compliance Services</b>		<b>76.50</b>		<b>\$33,015.00</b>
<b>Total - Hours and Compensation Sought - Hourly Services</b>		<b>845.50</b>		<b>\$846,502.60</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	)	) Chapter 7
	)	)
FORMER BL STORES, INC., <i>et al.</i> , <sup>1</sup>	)	) Case No. 24-11985 (KBO)
	)	)
Debtors.	)	(Jointly Administered)
	)	)
	)	Hearing Date: January 29, 2026, at 11:00 a.m. (ET)
	)	Objection Deadline: January 16, 2026, at 4:00 p.m. (ET)

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**COMBINED SIXTH MONTHLY, FOURTH INTERIM  
AND FINAL FEE APPLICATION OF PWC US TAX LLP AS TAX  
COMPLIANCE AND TAX ADVISORY SERVICES PROVIDER TO THE  
DEBTORS FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD FROM SEPTEMBER 9, 2024 THROUGH NOVEMBER 10, 2025**

PwC US Tax LLP (“PwC US Tax”), as tax compliance and tax advisory services provider to the debtors and debtors in possession (collectively, the “Debtors”) in the Debtors’ chapter 11 cases, hereby submits its combined sixth monthly, fourth interim and final fee application (this “Application”), pursuant to sections 330(a) and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “Bankruptcy Code”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rule 2016-2 of the Local Rules of Bankruptcy of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330* (the “Guidelines”), the *Order Establishing Procedures for Interim*

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<sup>1</sup> The debtors and debtors in possession in these chapter 7 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The former address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

*Compensation and Reimbursement of Expenses of Retained Professionals* [Docket No. 519] (the “Interim Compensation Procedures Order”), entered October 17, 2024, and the *Order (I) Converting Chapter 11 Cases to Cases Under Chapter 7, (II) Establishing Deadline for Filing Final Chapter 11 Fee Applications and Setting a Hearing Thereon, and (III) Granting Related Relief Order* [Docket No. 3319] (the “Conversion Order”), entered November 10, 2025, requesting the entry of an order granting allowance on a final basis and payment, to the extent not previously paid, in the amount of \$1,151,202.60 for the total compensation earned by PwC US Tax for its services to the Debtors during the final period from September 9, 2024 through and including November 10, 2025 (the “Final Application Period”), including \$26,110.20 for compensation earned by PwC US Tax for its services to the Debtors during the combined sixth monthly and fourth interim period from July 1, 2025 through and including November 10, 2025 (the “Fourth Interim Application Period”), which amount was not previously requested in a fee application. In support of this Application, PwC US Tax respectfully represents as follows:

#### **JURISDICTION AND VENUE**

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory and other bases for the relief requested herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, Local Rule 2016-2, the Guidelines, the Interim Compensation Procedures Order and the Conversion Order.

## **BACKGROUND**

3. On September 9, 2024 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. Prior to the Conversion Date, the Debtors operated their businesses and managed their property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On September 10, 2024, the Court entered an order authorizing the procedural consolidation and joint administration of the chapter 11 cases pursuant to Bankruptcy Rule 1015(b) [Docket No. 95].

4. No request for the appointment of a trustee or examiner was made in the Debtors’ chapter 11 cases. On September 23, 2024, the Office of the U.S. Trustee appointed an official committee of unsecured creditors [Docket No. 248].

5. On October 17, 2024, the Court entered the Interim Compensation Procedures Order. The Interim Compensation Procedures Order provides, among other things, that each retained professional shall be entitled, following the end of each monthly period for which compensation and/or expense reimbursement is sought, to file and serve a monthly fee statement for interim allowance of compensation for services rendered and reimbursement of expenses incurred during the preceding month (each a “Monthly Fee Application”). Parties shall have twenty-one (21) days after service of a Monthly Fee Application to file an objection to the compensation or expenses that are the subject thereof (the “Objection Deadline”). Upon the expiration of the Objection Deadline, the applicant may file a certificate of no objection (a “CNO”) with the Court with respect to the unopposed portion of the fees and/or expenses requested in the applicable Monthly Fee Application. After the filing of a CNO, the Debtors are authorized to and shall promptly pay the applicant an amount equal to 80% of the fees and 100% of the expenses requested in the applicable Monthly Fee Application not subject to an objection.

6. Additional information regarding the Debtors' organizational structure, business operations, historical revenues and liabilities, and a description of the events precipitating the filing of the Debtors' chapter 11 cases, is set forth in the *Declaration of Jonathan Ramsden as Chief Financial and Administrative Officer of the Debtors in Support of the Debtors' Chapter 11 Proceedings and First Day Pleadings* [Docket No. 3]

7. On November 10, 2025 (the "Conversion Date"), the Court entered the Conversion Order, thereby converting the Debtors' chapter 11 cases to cases under chapter 7 of the Bankruptcy Code, and Alfred T. Giuliano was appointed as chapter 7 trustee.

#### **RETENTION AND EMPLOYMENT OF PWC US TAX**

8. On September 18, 2024, the Debtors filed the *Application of Debtors for Entry of an Order (I) Authorizing the Retention and Employment of PwC US Tax LLP as Tax Compliance and Tax Advisory Services Provider to the Debtors Effective as of September 9, 2024, and (II) Granting Related Relief* [Docket No. 208] (as supplemented, the "PwC US Tax Retention Application").<sup>2</sup>

9. On October 10, 2024, the Court entered the *Order (I) Authorizing the Retention and Employment of PwC US Tax LLP as Tax Compliance and Tax Advisory Services Provider to the Debtors Effective as of September 9, 2024 and (II) Granting Related Relief* [Docket No. 291] (as amended, the "PwC US Tax Retention Order"),<sup>3</sup> approving the PwC US Tax Retention

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<sup>2</sup> Capitalized terms used in this Application but not otherwise defined herein shall have the meanings ascribed to such terms in the PwC US Tax Retention Application. Supplemental declarations in support of the PwC US Tax Retention Application were filed at Docket Nos. 343, 451, 589, 1143 and 2274.

<sup>3</sup> On October 18, 2024, the Court entered an *Amended Order (I) Authorizing the Retention and Employment of PwC US Tax LLP as Tax Compliance and Tax Advisory Services Provider to the Debtors Effective as of September 9, 2024 and (II) Granting Related Relief* [Docket No. 546].

Application and authorizing the retention and employment of PwC US Tax effective as of September 9, 2024, pursuant to the terms of the Engagement Letter.

### **PRIOR COMPENSATION REQUESTS OF PWC US TAX**

10. PwC US Tax previously filed and served the following monthly fee applications (collectively, the “Monthly Fee Applications”) and interim fee applications (collectively, the “Interim Fee Applications”), which are incorporated herein by reference as if fully set forth herein:

**(a) Monthly Fee Applications:**

Application No. / Date / Docket No.	Application Period	Fees Requested (80%/100%)	Expenses Requested (100%)	CNO Filed	20% Holdback	Fees and Expenses Paid to Date	Total Outstanding Fees and Expenses
Combined First Monthly; Filed: 12/17/2024; Dkt. No. 1377	9/9/2024 – 10/31/2024	\$219,566.16 (80% of \$274,457.70)	\$0.00	Filed 1/8/2025; Dkt. No. 1637	\$54,891.54	\$274,457.70 <sup>4</sup>	\$0.00
Second Monthly; Filed: 12/27/2024; Dkt. No. 1446	11/1/2024 – 11/30/2024	\$244,372.00 (80% of \$305,465.00)	\$0.00	Filed 1/22/2025; Dkt. No. 1825	\$61,093.00	\$305,465.00 <sup>5</sup>	\$0.00
Third Monthly; Filed: 1/29/2025; Dkt. No. 1874	12/1/2024 – 12/31/2024	\$55,555.20 (80% of \$69,444.00)	\$0.00	Filed 3/17/2025; Dkt. No. 2257	\$13,888.80	\$69,444.00	\$0.00
Fourth Monthly; Filed: 5/15/2025; Dkt. No. 2747	1/1/2025 – 3/31/2025	\$322,498.56 (80% of \$403,123.20)	\$0.00	Filed 7/16/2025; Dkt. No. 2972	\$80,624.64	\$403,123.20	\$0.00
Fifth Monthly; Filed: 8/14/2025; Dkt. No. 3086	4/1/2025 – 6/30/2025	\$58,082.00 (80% of \$72,602.50)	\$0.00	Filed 9/5/2025; Dkt. No. 3142	\$14,520.50	\$72,602.50	\$0.00
<b>Totals:</b>	<b>9/9/2024 – 6/30/2025</b>	<b>\$900,073.92 (80% of \$1,125,092.40)</b>	<b>\$0.00</b>		<b>\$225,018.48</b>	<b>\$1,125,092.40</b>	<b>\$0.00</b>

<sup>4</sup> \$20,000 was a pre-payment paid by the Debtors prior to the Petition Date.

<sup>5</sup> \$63,000 was a pre-payment paid by the Debtors prior to the Petition Date.

**(b) Interim Fee Applications:**

Application No. / Date / Docket No.	Application Period	Fees Requested (100%)	Expenses Requested (100%)	Interim Fee Order Entered	Fees and Expenses Paid to Date	Outstanding Fees and Expenses
First Interim; Filed: 1/29/2025; Dkt. No. 1875	9/9/2024 – 12/31/2024	\$649,366.70	\$0.00	Entered 3/18/2025; Dkt. No. 2271	\$649,366.70	\$0.00
Second Interim; Filed: 5/15/2025; Dkt. No. 2747	1/1/2025 – 3/31/2025	\$403,123.20	\$0.00	Entered 7/17/2025; Dkt. No. 2973	\$403,123.20	\$0.00
Third Interim; Filed: 8/14/2025; Dkt. No. 3086	4/1/2025 – 6/30/2025	\$72,602.50	\$0.00	Entered 9/9/2025; Dkt. No. 3150	\$72,602.50	\$0.00
<b>Totals:</b>	<b>9/9/2024 – 6/30/2025</b>	<b>\$1,125,092.40</b>	<b>\$0.00</b>		<b>\$1,125,092.40</b>	<b>\$0.00</b>

11. As set forth in the PwC US Tax Retention Application, prior to the Petition Date, the Debtors paid PwC US Tax a retainer of \$75,000.00, of which \$26,396.00 remained as of the Petition Date to be applied against approved post-petition fees, as requested in this Application.

12. As set forth above, PwC US Tax has been fully paid for amounts approved in connection with its prior Monthly Fee Applications and Interim Fee Applications. Accordingly, PwC US Tax is owed a total of \$26,110.20, subject to Court approval, as requested in this Application, in connection with service rendered during the Fourth Interim Application Period. Subject to Court approval, PwC US Tax will apply the aforementioned retainer balance to approved compensation during the Fourth Interim Application Period, as requested herein.

**RELIEF REQUESTED**

13. By this Application, and in accordance with the Interim Compensation Procedures Order and the Conversion Order, PwC US Tax requests the entry of an order granting allowance on a final basis and payment, to the extent not previously paid, in the amount of \$1,151,202.60 for

the total compensation earned by PwC US Tax for its services to the Debtors during the Final Application Period.

### **SUMMARY OF SERVICES RENDERED BY PWC US TAX**

#### ***(I) Fourth Interim Application Period***

14. The services rendered by PwC US Tax during the Fourth Interim Application Period are categorized as set forth in **Exhibit A** and in the summary cover sheet submitted with this Application. The professionals who provided services to the Debtors during the Fourth Interim Application Period are also identified, by billing category and project category, respectively, in **Exhibit B** and **Exhibit D** and in the summary cover sheet submitted with this Application. Attached hereto as **Exhibit C** and **Exhibit E** are detailed statements of the time expended and compensation earned by PwC US Tax during the Fourth Interim Application Period. PwC US Tax professionals expended a total of 1,121.80 hours in connection during the Fourth Interim Application Period, including 1,090.00 for fixed fee services and 31.80 for hourly services, which resulted in a blended hourly billing rate for professionals (solely for hourly services) of \$821.08.

#### ***(II) Final Application Period***

15. The services rendered by PwC US Tax during the Final Application Period are categorized as set forth in **Exhibit F** and in the summary cover sheet submitted with this Application. The professionals who provided services to the Debtors during the Final Application Period are also identified, by billing category and project category, respectively, in **Exhibit G** and **Exhibit H** and in the summary cover sheet submitted with this Application. Collectively attached to the Monthly Fee Applications, the Interim Fee Applications and this Application are detailed statements of the time expended and compensation earned by PwC US Tax during the Final Application Period. PwC US Tax professionals expended a total of 3,202.70 hours in

connection during the Final Application Period, including 2,357.20 for fixed fee services and 845.50 for hourly services, which resulted in a blended hourly billing rate for professionals (solely for hourly services) of \$1,001.19.

16. All services for which PwC US Tax is requesting compensation were performed for or on behalf of the Debtors.

17. The following is an overview of the services that PwC US Tax rendered as tax compliance and tax advisory services provider to the Debtors during the Final Application Period:

**(a) 2023 Tax Compliance Services. Hours: 1,020.20, Fees: \$98,000.00**

During the Final Application Period, PwC US Tax provided assistance in the preparation of the U.S. federal income tax return for Big Lots, Inc. and subsidiaries (“BLI”) for the tax year beginning January 29, 2023 through February 3, 2024, as requested by BLI; and prepared and signed as preparer certain U.S. state and local tax returns for BLI for the tax year beginning January 29, 2023, through February 3, 2024, as requested by BLI for itself and certain entities.

**(a) 2024 Tax Compliance Services. Hours: 1,337.00, Fees: \$220,000.00**

During the Final Application Period, PwC US Tax provided assistance in the preparation of the U.S. federal and state tax returns for Big Lots Stores, LLC (“BLS”) for the tax year beginning February 4, 2024, through February 1, 2025, as requested by BLS, for itself and certain entities.

**(b) Tax Advisory Services. Hours: 769.00, Fees: \$813,487.60**

During the Final Application Period, PwC US Tax professionals assisted Big Lots by analyzing potential tax attributes and tax considerations with respect to the potential debt restructuring as requested by Big Lots including, without limitation, the following services: (i) assisted in gaining an understanding of Big Lot’s tax information and attributes to estimate the outside stock basis and inside asset basis of Big Lots and its subsidiaries to the extent information is available; (ii) assisted in understanding the historic capital structure of each relevant entity, including the terms of historic and

<sup>6</sup> As set forth in the PwC US Tax Retention Application, the 2023 tax compliance engagement is a fixed fee arrangement whereby PwC US Tax has agreed to be paid a total \$150,000, exclusive of expenses. Prior to the Petition Date, PwC US Tax was paid \$135,000 for tax compliance services, of which \$83,000 remained as of the Petition Date to be applied against approved post-petition fees for such post-petition tax compliance services.

currently outstanding debt, recent capital contributions and distributions, and outstanding equity rights; (iii) assisted in understanding the income tax profile of Big Lots, including the overall balance sheet, tax attributes, and existing restrictions/limitations to tax attributes; and (iv) read draft purchase agreement and other supporting documents and provide comments with respect to tax matters provided for in such agreements.

(c) **Bankruptcy Compliance Services. Hours: 76.50, Fees: \$33,015.00**

During the Final Application Period, PwC US Tax professionals providing services to the Debtors consulted with internal PwC bankruptcy retention and billing advisors to ensure compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules and the Interim Compensation Procedures Order. The services provided by these bankruptcy retention and billing advisors included, but was not limited to: (a) assistance with preparation of the bankruptcy retention documents; (b) assistance with the disinterestedness disclosures; and (c) assistance with preparation of fee applications. All of the services are incremental to the normal billing procedures by PwC for its non-bankruptcy clients.

18. As set forth above, detailed descriptions of these services, the amount of fees incurred, and the amount of hours spent providing such services throughout the Final Application Period are provided in the exhibits collectively attached to Monthly Fee Applications, the Interim Fee Applications and this Application. All entries itemized in PwC US Tax's time records (i) are categorized in accordance with the appropriate project categories, (ii) include a description of each activity or service that each individual performed, and (iii) identify the number of hours (in increments of one-tenth of an hour for hourly services and one-half of an hour for fixed fee services) spent by each individual providing the services. However, in some instances, services may overlap between project categories. Thus, some services may appear under more than one project category; however, in no instance is a specific time entry recorded or charged more than once.

**SUMMARY OF EXPENSES INCURRED**

19. PwC US Tax does not request reimbursement of any expenses during the Fourth Interim Application Period or the Final Application Period.

**ALLOWANCE OF COMPENSATION**

20. The professional time expended by PwC US Tax, the value of said time in fees, and the value of the actual expenses incurred by the firm were actual, reasonable, and necessary. In all respects, PwC US Tax's fees and expenses meet the standards for allowance under Bankruptcy Code section 330, as well as the standards that govern the review and allowance of bankruptcy professionals' fees. *See, e.g., In re Busy Beaver Bldg. Ctrs., Inc.*, 19 F.3d 833 (3d Cir. 1994).

21. Bankruptcy Code section 331 provides for interim compensation of professionals and incorporates the substantive standards of Bankruptcy Code section 330 to govern the Court's award of such compensation. *See 11 U.S.C. § 331.* Bankruptcy Code section 330 provides that a court may award a professional employed under Bankruptcy Code section 327 the "reasonable compensation for actual, necessary services rendered . . . and reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1)(A)-(B). Bankruptcy Code section 330 also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded . . . the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed

(E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

(F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

22. The reasonable value of the services rendered by PwC US Tax for the Final Application Period as tax compliance and tax advisory services provider to the Debtors in the Debtors' chapter 11 cases is \$1,151,202.60. The hourly rates and fixed fees reflected on the exhibits hereto are PwC US Tax's customary rates and fees for work of this nature. The professional services performed by PwC US Tax were in the best interests of the Debtors and their estates and other parties in interest. Compensation for the foregoing services as requested is commensurate with the complexity, importance, and time-sensitive nature of the problems, issues, or tasks involved. The professional services were performed with expedition and in an efficient manner.

23. In accordance with section 330 of the Bankruptcy Code, the fees requested are reasonable in light of factors including, among other things, (a) the complexity of the chapter 11 cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title. Accordingly, allowance and payment of the compensation for professional services and reimbursement of expenses sought herein is warranted.

#### **RESERVATION OF RIGHTS**

24. Although PwC US Tax has made every effort to include all fees and expenses incurred during the Final Application Period in this Application, some fees and expenses may inadvertently be omitted from this Application, including as a result of accounting and processing

delays in the Final Application Period. PwC US Tax reserves the right to amend or supplement this Application to seek allowance of such fees and expenses not included herein. Any amended or supplemental fee applications will be filed in accordance with the requirements of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Interim Compensation Procedures Order.

**CERTIFICATION OF COMPLIANCE AND WAIVER**

25. To the best of its knowledge, PwC US Tax believes that this Application, together with the exhibits attached hereto, and the description of services set forth herein of work performed are in compliance with the requirements of the PwC US Tax Retention Order. To the extent that this Application does not comply in all respects with those requirements, PwC US Tax believes that such deviations are not material and respectfully requests that such requirements be waived.

**NOTICE**

26. In accordance with the Interim Compensation Procedures Order, this Application will be served upon the Compensation Notice Parties (as defined in the Interim Compensation Procedures Order). Notice of hearing on this Application will be served upon all parties that have requested notice in the Chapter 11 Cases pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, PwC US Tax submits that no other or further notice is necessary.

WHEREFORE, PwC US Tax requests the entry of an order (i) granting allowance on a final basis and payment, to the extent not previously paid, in the amount of \$1,151,202.60, which is equal to the \$1,151,202.60 of total compensation earned by PwC US Tax during the Final Application Period for its services to the Debtors; (ii) authorizing PwC US Tax to apply its pre-petition retainer balance to approved fees as requested herein; and (iii) granting such other and further relief as may be just and proper.

Dated: December 26, 2025

**PWC US TAX LLP**

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*Tax Compliance and Tax Advisory Services  
Provider to the Debtors*